

PHILLIP TALBERT  
United States Attorney  
MATHEW W. PILE, WSBA No. 32245  
Associate General Counsel  
Office of Program Litigation, Office 7  
MARY TSAI, CSBN 216963  
Special Assistant United States Attorney  
Office of Program Litigation, Office 7  
Office of the General Counsel  
Social Security Administration  
6401 Security Boulevard  
Baltimore, MD 21235  
Telephone: (510) 970-4864  
E-Mail: mary.tsai@ssa.gov  
Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**SACRAMENTO DIVISION**

KEVIN JABBAR MICKENS,	)	Case No.: 2:24-CV-1116 JDP (SS)
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	FOR AN EXTENSION OF TIME
vs.	)	
COMMISSIONER OF SOCIAL SECURITY,	)	
	)	
Defendant.	)	
	)	

Pending the Court's approval, the parties hereby stipulate that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended twenty-two (22) days from August 12, 2024, up to and including September 3, 2024.

This is Defendant's first request for an extension, and it is made with good cause. Defendant's counsel has worked diligently to meet the timelines provided by the Court but has been prevented from doing so by her busy schedule. Defendant's counsel has three briefs due in the beginning of August and seven in total in August, along with other litigation matters.

1 Defendant requests this extension in good faith and with no intent to delay these proceedings  
2 unnecessarily.

3 The parties further stipulate that the Court's Scheduling Order shall be modified  
4 accordingly.

5 Respectfully submitted,

6 Dated: August 6, 2024

/s/ Francesco Paulo Benavides\*  
(\*as authorized via e-mail on August 6, 2024)  
FRANCESCO PAULO BENAVIDES  
Attorney for Plaintiff

9 Dated: August 6, 2024

10 PHILLIP A. TALBERT  
United States Attorney

11 MATHEW W. PILE  
12 Associate General Counsel  
13 Office of Program Litigation, Office 7


14 By: /s/ Mary Tsai  
MARY TSAI  
15 Special Assistant U.S. Attorney  
16 Office of Program Litigation, Office 7  
17 Attorneys for Defendant

18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an  
20 extension, up to and including September 3, 2024, to respond to Plaintiff's Motion for Summary  
21 Judgment.

22 IT IS SO ORDERED.

23  
24 Dated: August 7, 2024

  
JEREMY D. PETERSON  
UNITED STATES MAGISTRATE JUDGE